



KRONENBERGER ROSENFELD

March 4, 2021

MEMO ENDORSED

The Hon. Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

VIA ECF

**RE: *Bishop v. Automated Pet Care Products, LLC*, Case No. 1:20-cv-8862-SHS
Joint Motion to Adjourn March 11, 2021 Initial Conference**

Dear Judge Stein:

Cedric Bishop, on behalf of himself and all other persons similarly situated, ("Plaintiff") and Automated Pet Care Products, LLC ("Defendant"), by and through their undersigned counsel in the above-entitled matter (the "Action"), hereby respectfully request that the Initial Conference scheduled for March 11, 2021 at 2:30 p.m. be adjourned for sixty (60) days. Good cause exists for the requested adjournment as follows:

This is the second request to adjourn the Initial Conference. Plaintiff previously requested adjournment on December 23, 2020, before Defendant had been served or appeared. (Doc. No. 7.) Defendant only appeared in the Action on February 19, 2021, when it filed its Motion to Dismiss the Complaint. (Doc. No. 11.) On March 3, 2021, Plaintiff filed his First Amended Complaint pursuant to Federal Rule of Civil Procedure 15(a)(1)(B). (Doc. No. 14.) Defendant anticipates filing an additional motion to dismiss. As such, the Action is still in the pleadings phase and will likely remain there for the immediate future. For this reason, the parties believe it would be premature to hold the Initial Conference as scheduled on March 11, 2021 and request additional time.

Accordingly, the parties jointly and respectfully request that the March 11, 2021 Initial Conference be adjourned for sixty (60) days, or such other period as the Court deems fit.

Respectfully Submitted,

GOTTLIEB & ASSOCIATES

/s/ Jeffrey M. Gottlieb
Jeffrey M. Gottlieb

Counsel for Plaintiff Cedric Bishop

**The conference is adjourned to June 10,
2021, at 10:00 a.m.**

**Dated: New York, New York
March 11, 2021**

KRONENBERGER ROSENFELD, LLP

/s/ Karl S. Kronenberger
Karl S. Kronenberger

Counsel for Defendant Automated Pet
Care Products, LLC

SO ORDERED:

Sidney H. Stein
Sidney H. Stein, U.S.D.J.